

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>  <b>Bobby Dockery</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 24-06098</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Timothy A. Barnes</b>
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**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on Thursday, March 13<sup>th</sup>, 2025 at 10:00am, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, either in Courtroom 744 at 219 S Dearborn St, Chicago, IL 60604 or electronically as described below, and present the Debtor's attached MOTION TO MODIFY PLAN.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276, and the passcode is 433658. The meeting ID can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

**By:** */s/ Charles Field Kinzer*  
Charles Field Kinzer

**CERTIFICATE OF SERVICE**

I, Charles Field Kinzer,

☒ an attorney, certify

-or-

☐ a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method shown on February 18, 2025 at 7:09 PM.

By: /s/ Charles Field Kinzer

Charles Field Kinzer  
Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
312.332.1800  
ndil@geracilaw.com

\* All applicable boxes must be checked and all blanks filled in.

**LIST OF PARTIES SERVED**

Via ECF:

Thomas H. Hooper, 55 E. Monroe St. #3850 , Chicago, IL 60603

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

By regular mail:

Bobby Terrell Dockery, 104 Fellows Ct , Elmhurst, IL 60126

SEE ATTACHED LIST FOR ALL PARTIES SERVED

Bobby Terrell Dockery  
119 N. Mayfield St.  
Chicago, IL 60644

Capital One  
Attn: Bankruptcy Dept.  
PO BOX 31293  
SALT LAKE CITY UT 84131

City of Chicago Bureau Parking  
Bankruptcy Dept/City Clerk  
121 N. LaSalle St  
Room 107  
Chicago IL 60602

Comenitybank/Jared  
Attn: Bankruptcy Dept.  
PO BOX 182789  
COLUMBUS OH 43218

Credit One Bank Na  
Attn: Bankruptcy Dept.  
PO BOX 98875  
LAS VEGAS NV 89193

Credit Control, LLC  
Bankruptcy Dept.  
3300 Rider Trl S Ste 500  
Earth City MO 63045

Elmhurst Terrace Apartments  
100 Fellows Court  
Elmhurst IL 60126

First Premier Bank  
Attn: Bankruptcy Dept.  
601 S MINNESOTA AVE  
SIOUX FALLS SD 57104

IDES  
Bankruptcy Department  
33 S. State Street  
8th Floor  
Chicago IL 60603

Illinois Department of Revenue  
Bankruptcy Department  
PO Box 19035  
Springfield IL 62794

IRS Non-Priority  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia PA 19101

IRS Priority Debt  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia PA 19101

LVNV Funding  
Bankruptcy Department  
355 S Main St Ste 300-D  
Greenville SC 29601

Credit Control, LLC  
Bankruptcy Dept.  
3300 Rider Trl S Ste 500  
Earth City MO 63045

Merrick Bank  
Bankruptcy Department  
PO Box 5000  
Draper UT 84020

Mission Lane Tab Bank  
Attn: Bankruptcy Dept.  
101 2ND ST STE 350  
SAN FRANCISCO CA 94105

North Side L  
Attn: Bankruptcy Dept.  
1419 W ROOSEVELT RD  
BROADVIEW IL 60155

Opp Loans  
Attn: Bankruptcy Dept.  
130 E RANDOLPH ST STE 34  
CHICAGO IL 60601

Pathward Na/Oportun  
Attn: Bankruptcy Dept.  
5501 S BROADBAND LN  
SIOUX FALLS SD 57108

Sprint  
Bankruptcy Dept.  
PO Box 7949  
Overland Park KS 66207

Tbom/Milestone  
Attn: Bankruptcy Dept.  
PO BOX 4499  
BEAVERTON OR 97076

Concora Credit  
Bankruptcy Dept.  
14600 NW Greenbriar Pkwy  
Beaverton OR 97006

Village of Bellwood  
Attn: Bankruptcy Dept.  
3200 Washington Blvd.  
Bellwood IL 60104

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<b>In Re:</b>  <b>Bobby Dockery</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 24-06098</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Timothy A. Barnes</b>
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**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Mr. Bobby Dockery (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY PLAN**, and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 04/25/2024.
3. The Debtor’s plan was confirmed by the Court on 9/5/2024.
4. In the late fall of 2024, the Debtor experienced an unexpected spike in his household expenses. He subsequently fell behind on his plan payments, and he has now incurred a motion to dismiss for nonpayment, which is being heard alongside this motion.
5. The Debtor is working and has resumed paying the Trustee in full. He believes he can continue to pay the Trustee going forward. He cannot, however, cure his full default in a lump sum. See Exhibit A, an amended budget.
6. The Debtor further reports that payroll deductions have begun being deducted from his paychecks.
7. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to defer the arrears to the end of the plan term.

WHEREFORE THE DEBTOR, Mr. Bobby Dockery, respectfully request this Honorable Court enter an order:

1. Deferring arrears to the end of the plan term.
2. Any other relief the court deems proper.

**By:** /s/ Charles Field Kinzer  
Charles Field Kinzer  
Attorneys for the Debtors  
Geraci Law L.L.C.  
55 E. Monroe Street #3400  
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